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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

SUBJECT: Shaffer Deposition Notices

DATE: 10-9-91

FROM: Charles Hayden  
Assistant Regional Counsel

TO: See Distribution List

260-9930

Please be advised that the below listed former and present EPA employees have been noticed to be deposed in Charleston, West Virginia, regarding the Shaffer Equipment Site Removal Action that began in December 1984 in Minden, West Virginia.

10/16/91	<del>Benton Wilmoth</del>	
10/21/91	Thomas P. Eichler	- Dave Del.
10/21/91	Charlene Arnold	
10/21/91	Steve Jarvela	
10/21/91	Raymond German	Berwind Corp.
10/22/91	Timothy Farris	- H2 260-6303
10/22/91	Mary Letzkus	
10/23/91	Thomas C. Voltaggio	(609) 829-7014 296
10/23/91	Ben Mykwijencz	(609) 829-7014 3480
10/23/91	Thomas Massey	(609) 829-7014 3480
10/24/91	Robert E. Caron	
10/25/91	Andy Zownir	(201) 340-6740
10/25/91	Robin Aitken	(609) 398-8277

The Department of Justice will be requesting that a Protective Order be entered to prevent most of the above persons from having to testify; to move the deposition location to Philadelphia; and to limit the scope of the inquiry.

Although the Protective Order may be entered I have been advised by the assigned DOJ attorney that each person should be prepared to appear in Charleston on the above listed date and/or on the date that the Motion for Protective Order is argued. The likelihood is that the motion will be granted and some agreement will be rendered between counsel to obviate the need for travel to West Virginia. However, we can't rely solely on that happening in this case.

The assigned DOJ attorney or someone from ORC will contact you prior to your deposition if and whenever they occur. Cecil Rodrigues is handling this case in my place until I return from vacation on October 21, 1991.

Walter Ram